



SEALED

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FILED

United States District Court

District of Nevada

2018 SEP 13 PM 4:52

1 UNITED STATES OF AMERICA,

2 Plaintiff

3 vs.

4 JIMMY DAVID WASHINGTON, JR,

5 and

6 DEMECIA SHONTRES WASHINGTON,

7 Defendants

U.S. MAGISTRATE JUDGE

Magistrate No. BY 2:18-mj-0798-PAL

ORDER TO SEAL

8 Based on the pending Application of the Government, and good cause appearing
9 therefor, **IT IS HEREBY ORDERED** that the Affidavit, the Government's Application and
10 this Court's Sealing Order, in the above-captioned matter shall be sealed until further Order
11 of the Court.

12 DATED this 13th day of September, 2018.

14 
15 UNITED STATES MAGISTRATE JUDGE

FILED

2018 SEP 13 PM 4:52

U.S. MAGISTRATE JUDGE

BY _____

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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

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10 UNITED STATES OF AMERICA,
11 Plaintiff
12 vs.
13 JIMMY DAVID WASHINGTON, JR,
14 and
15 DEMECIA SHONTRES WASHINGTON,
Defendants

Magistrate No. 2:18-mj-0798-PAL

APPLICATION TO SEAL

16 COMES NOW the United States of America, by and through Dayle Elieson, United
17 States Attorney, and ELHAM ROOHANI, Assistant United States Attorney, respectfully
18 moves this Honorable Court for an Order sealing the Affidavit, this Application and the
19 Court's Sealing Order, in the above-captioned matter, until such time as this Honorable
20 Court, or another Court of competent jurisdiction, shall order otherwise.

21 According to Title 18, United States Code, Section 3103a(b)(1) the court may delay
22 any notice required, or that may be required, if there is reasonable cause to believe that
23 providing immediate notification of the existence and execution of the warrant may have

1 an adverse result. In this case, such an order would be appropriate because the attached
2 Affidavit relates to an ongoing criminal investigation into violation(s) of Conspiracy to
3 Commit Sex Trafficking, 18 U.S.C. § 1594(c); Sex Trafficking, 18 U.S.C. §§ 1591(a)(1),
4 (a)(2), (b)(2) and (c) and 18 U.S.C. § 2; Conspiracy to Transport for Prostitution or Other
5 Criminal Sexual Activity, 18 U.S.C. § 1594(c); Transportation for Prostitution or Other
6 Criminal, Sexual Activity, 18 U.S.C. § 2423(a) and 18 U.S.C. § 2; Conspiracy to Sexually
7 Exploit Children, 18 U.S.C. § 2251(a) and (e); Sexual Exploitation of Children, 18 U.S.C. §
8 2251(a) and (e); and Distribution of Child Pornography, 18 U.S.C. § 2252A(a)(2) and (b);
9 that is neither public nor known to all of the targets of the investigation, and its disclosure
10 may alert the targets to the ongoing investigation. Accordingly, there is reason to believe
11 that disclosure of the information will jeopardize the investigation, including by giving the
12 Defendants an opportunity to flee, to evade capture, or continue flight from prosecution,
13 which would thereby put law enforcement lives at risk during the attempt to effectuate
14 the arrest warrant. Additionally, disclosure of the information would give the Defendants
15 an opportunity to destroy valuable information that may be contained on mobile devices
16 and email accounts in their possession and control. Finally, to the extent that there may
17 be other victims or confederates unknown to the Government at this early stage in the
18 investigation, disclosure of the information would give the Defendants an opportunity to
19 tamper with witnesses, change their own behavior, and notify confederates who could also
20 destroy evidence and change their patterns of behavior.

21 The Government further submits that it is necessary for the Affidavit to be sealed
22 in light of the fact that the minor victim has returned to her state of residence and the
23 Defendants, who are currently at liberty and know the identity and home address of the

1 minor victim, may intimidate or otherwise endanger the life or physical safety of the
2 minor victim.

3 DATED this 13th day of September, 2018.

4 Respectfully submitted,
5 DAYLE ELIESON
6 United States Attorney

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8 ELHAM ROOHANI
9 Assistant United States Attorney

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